

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JOVAN VAVIC,

Defendant

No. 1:19-CR-10081-IT

JOINT MOTION TO CONTINUE DEADLINES FOR JURY INSTRUCTIONS

The government and defendant Jovan Vavic respectfully move to continue the deadlines previously set by the Court as to the parties' proposed jury instructions. *See* Dkt. 948, 972. As grounds for this motion, the parties state that, on November 5, 2021, co-defendant Donna Heinel entered a plea of guilty to Count 11 of the Second Superseding Indictment. The defendants are therefore no longer coordinating on their proposed jury instructions and their objections to the government's proposed jury instructions. Accordingly, the parties respectfully request that the Court reset the deadlines for jury instructions to reflect the trial date of March 8, 2022 for defendant Vavic, and to include those deadlines in the Court's forthcoming amended pretrial order.

NATHANIEL R. MENDELL
Acting United States Attorney

JOVAN VAVIC
Defendant

By: /s/ Leslie A. Wright
KRISTEN A. KEARNEY
LESLIE A. WRIGHT
KRISS BASIL
Assistant United States Attorneys

By: /s/ Stephen G. Larson
STEPHEN G. LARSON (*pro hac vice*)
KOREN L. BELL (*pro hac vice*)
PAUL A. RIGALI (*pro hac vice*)
Larson LLP

IRWIN B. SCHWARTZ
NICHOLAS R. CASSIE
BLA Schwartz, PC

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will be sent electronically to the registered participants identified on the Notice of Electronic Filing (NEF).

By: /s/ Leslie A. Wright
LESLIE A. WRIGHT
Assistant United States Attorney